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1 and she, during that visit, called Dr. Garrison and
 2 asked that he free up some time so that he could see
 3 me. In fact, she made the appointment.
 4 Q. And Dr. Moner, is she your primary care
 5 physician?
 6 A. Yes.
 7 Q. Are doctors Moner, Gupta, and Garrison all
 8 housed in the same building?
 9 A. No.
 10 Q. Are any of them housed in the same building?
 11 A. No. May I qualify that?
 12 Q. Sure.
 13 A. Dr. Gupta is no longer with Lahey Clinic.
 14 He has his own private practice, I believe, in
 15 Lynnfield, Massachusetts. Dr. Garrison was not
 16 housed in the same building, but the building that
 17 Lahey Clinic had at the time was down the road from
 18 the Lahey Peabody, Mass. place, so -- and Dr.
 19 Garrison is now, I believe, in Burlington where they
 20 have their mental health facility within the campus.
 21 It's not in the same large building, but it's in the
 22 campus, and you have to go around and go from there.
 23 Is that too much detail?
 24 Q. No, that's great. Thank you. I'm happy to

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1 hear whatever you have to say. Are the three
 2 doctor, Garrison, Gupta and Moner, are they all
 3 affiliated, or at that time were they all affiliated
 4 with the Lahey Clinic?
 5 A. Say again, please.
 6 Q. Was Dr. Moner affiliated the Lahey Clinic?
 7 A. Yes. She was still is.
 8 Q. And Dr. Gupta?
 9 A. He's not, but he was at the time.
 10 Q. And Dr. Garrison was but now is not?
 11 A. Dr. Garrison is also with Lahey. The only
 12 one that is not is Dr. Gupta. He has his own
 13 private practice.
 14 Q. I want to take you back again to my
 15 question, because now I think I'm confused, and
 16 that's my fault.
 17 A. Okay.
 18 Q. You said that at the time you were
 19 terminated, you were told by these three physicians
 20 Dr. Gupta, Dr. Moner, and Dr. Garrison, that you had
 21 severe depression; is that correct?
 22 A. No.
 23 Q. Okay.
 24 A. What I said was, at the time I was

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1 terminated, Dr. Garrison said that I was not able to
 2 work. The diagnosis of me being severely depressed
 3 happened much earlier.
 4 Q. Do you recall, ballpark, when that was?
 5 A. '97, '96.
 6 Q. So then tell me -- I'm going to try and
 7 characterize what you said, summarize it, to make
 8 sure I understand. If I understand correctly,
 9 you're saying that sometime between 1996 and 1997,
 10 you were told that you had severe depression.
 11 A. Correct.
 12 Q. That in September of 2000 when you were
 13 terminated, you were told that you were still
 14 suffering from that severe depression.
 15 A. Yes, and it was debilitating, that's what I
 16 was told after I was terminated, not during my
 17 employment.
 18 Q. So that after the time that you were
 19 terminated, you were told that the depression was so
 20 severe that it was debilitating?
 21 A. Yes, and Dr. Garrison wrote a letter saying
 22 I was not able to work.
 23 Q. And is he the person that told you it was so
 24 debilitating that you shouldn't work?

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1 A. I don't know if he used those words exactly,
 2 but to the best of my recollection, at that time --
 3 he said I was not able to work.
 4 Q. What I'm looking for is who gave you that
 5 instruction, whether it was Dr. Garrison and Dr.
 6 Gupta or Dr. Moner. Sounds to me like it was mostly
 7 Dr. Garrison?
 8 A. At the time of my termination?
 9 Q. Yes, ma'am.
 10 A. Yes.
 11 Q. You said that Dr. Garrison also told you
 12 that the medicine wouldn't allow you to work; is
 13 that correct?
 14 A. I don't believe he said that.
 15 Q. I wrote down, and the record will reflect
 16 what it reflects, but I wrote down when I asked you
 17 about whether or not you had sought employment after
 18 you were terminated, I wrote down that you were told
 19 you had severe depression and that the medicines
 20 wouldn't allow you to work.
 21 A. Okay. It's my fault. I misunderstood you.
 22 Q. That's okay.
 23 A. I was given additional medicine that
 24 required a lot of bedrest and, also, that I not